

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: James Sidney Ingram )  
                                )  
                                )  
                                ) Case No. 16-30701-KRH  
                                )  
                                )  
                                ) Chapter 13  
Debtor(s) Address         )  
8005 Creighton Pkwy Ste C #200     )  
Mechanicsville, VA 23111         )  
                                )  
Last four digits of Social Security No(s).: 5220     )  
                                )  
                                )

**NOTICE OF MOTION (OR OBJECTION)**

James Sidney Ingram has filed papers with the court to Vacate the Order of Dismissal and Reinstate the Case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before May 23, 2016, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad St.  
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.  
8501 Mayland Dr., Ste 106  
Henrico, VA 23294

- Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- Attend the hearing on the motion (or objection) scheduled to be held on June 1, 2016 at 12:00 p. m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm 5000 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 5/9/2016

Signature, name, address, and telephone number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton

America Law Group

8501 Mayland Dr. Ste 106

Henrico, VA 23294

Virginia State Bar No. 29640

Counsel for James Sidney Ingram

Certificate of Service

I hereby certify that I have this 9<sup>th</sup> day of May, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

**ACE Sales Group**  
657 West Indiantown Rd  
Ste 205  
Jupiter, FL 33458

**Fredericksburg Credit Bureau**  
10506 Wakeman Dr.  
Fredericksburg, VA 22407

**Greenline Loans**  
PO Box 507  
Hays, MT 59527

**Penn Credit**  
PO Box 988  
Harrisburg, PA 17108

**Progressive Finance**  
PO Box 413110  
Salt Lake City, UT 84141

**Sharon Horner & Assoc. PLC**  
6804 Patterson Ave, Ste A  
Richmond, VA 23226

**Wells Fargo Bank NA**  
Recovery Dept  
PO Box 5058  
Portland, OR 97208

**White Hills Cash**  
Island Finance  
PO Box 330

Hays, MT 59527

**Acceptance Now**

attn: Customer Service  
501 Headquarters Dr  
Plano, TX 75024-0000

**Affirm, Inc.**

PO Box 2854  
San Francisco, CA 94126

**Ashley Furniture Homestore**

6312 W Broad St.  
Richmond, VA 23230

**Capital One**

Attn: Bankruptcy  
PO Box 30285  
Salt Lake City, UT 84130-0000

**Celtic Bank/contfinc**

121 Continental Dr Ste 1  
Newark, DE 19713-0000

**Central Furniture Company, Inc**

3700 Mechanicsville Tnpk  
Richmond, VA 23223-0000

**Child Support Va**

Bk Unit/Div. of Child Support Enforcemen  
2001 Maywill St Ste. 104  
Richmond, VA 23230-0000

**Contract Callers Inc.**

501 Greene St. Suite 302  
Augusta, GA 30901

**Credit Acceptance**

25505 West 12 Mile Rd  
Suite 3000  
Southfield, MI 48034-0000

**Credit Collection Svcs**

725 Canton St.  
Norwood, MA 02062

**Credit Control Corp**

PO Box 120568  
Newport News, VA 23612-0000

**Dominion Dermatology PC**

5201-A Hickory Park Dr.  
Glen Allen, VA 23059

**Dominion Virginia Power**

PO Box 26543  
Richmond, VA 23290

**DriveTime**

4112 West Broad St.  
Richmond, VA 23230

**Enterprise Rent A Car**

323 Alexander Lee Pkwy  
Williamsburg, VA 23185

**ERC/Enhanced Recovery Corp**

8014 Bayberry Rd  
Jacksonville, FL 32256-0000

**Fast Auto Loans**

5218 West Broad Street  
Richmond, VA 23230-0000

**First Premier Bank**

601 S Minneapolis Ave  
Sioux Falls, SD 57104-0000

**First Virginia Fin Svcs**

9121 Staples Mill Rd  
Henrico, VA 23228

**Focus Recovery Solutions**

Attn: Bankruptcy  
9701 Metropolitan Court Ste B  
Richmond, VA 23236-0000

**Fradkin & Weber, PA**

c/o Jason R. Weber, Esq  
200 East Joppa Road, Suite 301  
Towson, MD 21286

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200 E Joppa Rd  
Towson, MD 21286-0000

**Fred Emer Med Alliance**

PO Box 888  
Fredericksburg, VA 22404

**Golden Valley Lending Inc.**

635 East Highway 20, E  
Upper Lake, CA 95485

**Henrico Doctors Hospital**

PO Box 13620  
Richmond, VA 23225

**Jefferson Capital Systems, LLC**

16 Mcleland Rd  
Saint Cloud, MN 56303-0000

**M&T Bank**

PO Box 64679  
Baltimore, MD 21264

**Mabt/contin**

121 Continental Dr Ste 1  
Newark, DE 19713-0000

**Maryland State Income Tax**

Comptroller of Maryland  
110 Carroll St.  
Annapolis, MD 21411-0000

**Mid America Bank & Tru**

5109 S Broadband Ln  
Sioux Falls, SD 57108-0000

**Mid America Bank & Trust**

Total Visa  
P.O. Box 91510  
Sioux Falls, SD 57109-1510

**MidAmerica Bank & Trust**

TCI  
P.O. Box 5217  
Sioux Falls, SD 57117

**Neurological Associates Inc**

7301 Forest Ave, Suite 302  
Richmond, VA 23226-0000

**Nicholas Financial Inc**

2454 McMullen Booth Road  
Clearwater, FL 34619-0000

**NPAS Solutions**

PO Box 2248  
Maryland Heights, MD 63043

**One Hampton Medical**

PO Box 3475  
Toledo, OH 43607

**Powell Inc**

1 Fisher Street  
Halifax, PA 17032-0000

**Progressive Insurance**

6300 Wilson Mills Rd  
Mayfield Village, OH 44143

**Radiologic Assoc. of Fred**

PO Box 7819  
Fredericksburg, VA 22404

**RJM Acquisitions**

575 Underhill Blvd Ste 224  
Syosset, NY 11791

**South Gate Financial LLC**

PO Box 103  
Culpeper, VA 22701

**Stafford Hospital Center**

2300 Fall Hill #313  
Fredericksburg, VA 22401-0000

**State Farm Mutual Auto Ins.**

One State Farm Plaza  
Bloomington, IL 61710-0000

**SURGE**

PO Box 8099  
Newark, DE 19714

**T-Mobile Bankruptcy Team**

PO Box 53410  
Bellevue, WA 98015-5341

**United Services Automobile**

USAA  
9800 Fredericksburg Rd  
San Antonio, TX 78288-0000

**USA Discounters Credit**

PO Box 8008  
Attn: Bankruptcy Department  
Virginia Beach, VA 23450-0000

**USA Discounters, LTD. D/B/A USA Living**

PO Box 41007  
Norfolk, VA 23541

**USA Living**

PO Box 41007  
Norfolk, VA 23541

**USAA c/o Sharon N. Horner & Assoc. PLC**

6804 Patterson Ave., Ste. A  
Richmond VA 23226

**Valley Storage Robinwood**

11133 Robinwood Dr.  
Hagerstown, MD 21742-0000

**Verizon**

500 Technology Dr  
Suite 500  
Weldon Spring, MO 63304-0000

**Verizon Wireless**

PO Box 25505  
Lehigh Valley, PA 18002-5505



**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**IN RE:**

James Sidney Ingram

16-30701-KRH  
Chapter 13

Debtor(s)

**MOTION TO VACATE ORDER OF DISMISSAL**

To the Honorable Court:

The Debtor moves this Court as follows:

1. On February 19, 2016, the Debtor filed a voluntary petition in bankruptcy.
2. DCSE filed an objection to confirmation on March 25, 2016, as Debtor owed pre-petition child support arrears that the plan did not acknowledge, and he owed post-petition child support arrears.
3. An Order Denying Confirmation of Plan was filed on April 13, 2016.
4. Debtor had 21 days (until May 4, 2016) to file a modified plan or the case would be dismissed.
5. Debtor's counsel tried to address the denial of confirmation but was unable to do so in a timely fashion for the following reason:
  - a. Debtor's counsel placed a call to DCSE to request whether the arrears could be included in the modified plan and to determine the exact amount of arrears but did not receive a response before the allotted time expired.

WHEREFORE, Debtor requests that this Court vacate its order of dismissal and reinstate his Chapter 13 case to permit him to make payments to his creditors and complete his Chapter 13 bankruptcy.

Counsel for James Sidney Ingram, Debtor

Richard J. Oulton, Esquire  
VSB 29640  
America Law Group  
t/a Debt Law Group  
8501 Mayland Dr. Ste 106  
Richmond, VA 23294  
804-308-0051 (ph)  
804-308-0053 (fax)

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1,  
UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING  
MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON  
THE MOVING PARTY WITHIN FOURTEEN (14) DAYS OF THE SERVICE OF  
THIS MOTION TO REINSTATE CHAPTER 13 CASE THE COURT MAY DEEM  
ANY OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE  
MOTION WITHOUT FURTHER NOTICE OR HEARING.

James Sidney Ingram

Date: 5/9/2016

By /s/ Richard J. Oulton  
Attorney for Debtor

Certificate of Service

I hereby certify that I have this 5/9/2016 mailed a true copy of the foregoing Notice of Motion and Hearing to Suzanne Wade, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780, The U.S. Trustee 701 E. Broad St., Ste.4304 Richmond, VA 23219, and all the creditors and necessary parties listed on the attached mailing list.

/s/ Richard J. Oulton  
Richard J. Oulton

## Creditors

**ACE Sales Group**  
657 West Indiantown Rd  
Ste 205  
Jupiter, FL 33458

**Fredericksburg Credit Bureau**  
10506 Wakeman Dr.  
Fredericksburg, VA 22407

**Greenline Loans**  
PO Box 507  
Hays, MT 59527

**Penn Credit**  
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